



**THE FACULTY OFFICE OF THE ARCHBISHOP OF CANTERBURY
ANNUAL ANTI-MONEY LAUNDERING SUPERVISOR'S REPORT
2023**

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Foreword

Our supervisory role remains a paramount priority. Through our supervisory activities, we continue to monitor and, where required, change behaviour within our regulated sector. We make use of both persuasive and dissuasive action to prevent notaries from being used by criminals to launder money, evade sanctions, or fund terrorism. We particularly want to disseminate good practice and highlight bad practice identified through our inspections and desktop reviews. We disseminate this information through our newsletters and website.

Highlights during this period include:

- Under the Notaries (Required Continuing Professional Education) (Anti-Money Laundering) Order 2022, at least one of the CPE credit points required must be obtained in the subject of anti-money laundering and counter terrorism financing applicable to the UK. This reflects the importance of the AML topic generally, especially in the current geopolitical situation and responds to the attention which the Government, through OPBAS, is now paying to this subject. Supervision is based on risk assessment and education in this field is an excellent way of reducing the risk profile of notaries, especially where they are engaged in higher risk areas of work. This education requirement helps to provide Notaries with the necessary skills to identify AML related 'red-flags' in their practice.
- We have modernised the system for applying, considering and approving applications for new admissions so that this can now be done entirely online. As before, our role as a gatekeeper to make sure only persons of good character with an unblemished professional record become notaries, is key.
- Initiating a review of our disciplinary systems with a view to introducing administrative sanctions which would mean that the less serious and less complex cases can be handled between the Faculty Office and the notary, rather than requiring a disciplinary tribunal in each case. Another topic for consideration is how best to support and equip those who have the task of bringing disciplinary proceedings to the Court of Faculties.
- Testing and verifying risks for those notaries not in scope of the money laundering regulations to ensure that they are not inadvertently misreporting the services they provide.
- Obtaining a change in the law so that since 2023 the profession of notaries has been an excepted profession which allows the Faculty Office to ask for and consider criminal convictions and cautions that are spent, but not filtered, as well as those which are unspent. We also published new guidance on how we vet notaries for criminal convictions and cautions.
- Holding a high-profile lecture on the rule of law by Sir Keith Lindblom, Senior President of Tribunals, at which notaries and members of the public were invited.

- Continued to profile the risks which come with Russian sanctions and highlighted proliferation sanctions through our dedicated financial crime page and through communications with notaries.
- Codified our policy for conducting inspections remotely.

In its annual report the Office for Professional Body Supervisors highlighted a number of areas for improvement in the legal and accountancy sector generally, including a need for risk-based processes to include proportionate coverage of medium to low-risk practitioners, swifter corrective measures, and a cultural change in PBSs approach to information sharing. With this in mind, going forward, we will reflect on considerations around subjectivity, thresholds, fairness, and consistency.

Howard Dellar, Registrar

The Faculty Office

October 2023

Background

The term “Notary” or “notary public” is a protected title. A notary is a specialist lawyer and only those qualified and registered can call themselves notaries.

Notaries have been appointed by the Master of Faculties through the Faculty Office since the sixteenth century and are supervised under rules made pursuant to the Courts and Legal Services Act 1990 and the Legal Services Act 2007.

The Faculty Office is completely independent from the notarial representative bodies (the Notaries Society and Society of Scrivener Notaries). However, we value very much our engagement with the Notaries Society and the Society of Scrivener Notaries who do so much to propagate good practice amongst their members in fending off financial crime and promoting best practice.

Under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (Money Laundering Regulations) the Faculty Office also has designated supervisory functions for the purposes of the UK’s anti money laundering framework.

The Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Money Laundering Regulations impose obligations on a notary when the work in which they are involved falls within one of the work types set out in the definition of regulated sector. However, the principal role of a notary in England and Wales is to “attest the authenticity” of deeds and other legal documents for use abroad. Scrivener notaries are notaries with additional qualifications and who have expertise in at least two foreign languages.

As such, the Money Laundering Regulations do not apply to work undertaken by a notary acting solely as a public certifying officer where they have no substantive role in the underlying transaction. However, a notary may fall within the definition of an independent legal professional under the Money Laundering Regulations when participating in certain financial or real property transactions.

The key document as far as notaries are concerned is the Legal Sector Affinity Group (LSAG) Anti-Money Laundering Guidance for the Legal Sector, approved by the Treasury in July 2022. This

Guidance brings together mandatory and advisory information for all legal professionals. Part 2c of the Guidance contains specific provision for notaries.

The Faculty Office rely upon notaries being cognisant with and following this Guidance and supplemental advisory notes. We are careful not to mediate or reinterpret what has been designed as a reasonably definitive and authoritative statement of what notaries must and should do.

The Notaries (Prevention of Money Laundering) Rules 2008 create a specific requirement that notaries be familiar with the Treasury approved Guidance. A failure to comply with the Guidance could amount to notarial misconduct under the Notaries (Conduct and Discipline) Rules 2019 and lead to disciplinary action. It is also the case that the professional body supervisory responsibilities are freestanding obligations and do not flow from the Legal Services Act 2007.

Notaries are primarily concerned with the authentication and certification of signatures, authority and capacity relating to documents for use abroad. Often a document will have been prepared by a foreign lawyer. They include powers of attorney, sworn statements, contracts, property papers and certificates of law. This work may be conducted for individuals or corporate entities.

All notaries of England and Wales operate within the territory of England and Wales although much of their work is destined to overseas jurisdictions. Therefore, we would suggest that, strictly as notaries, 0% conduct operations outside of the UK, but close to 100% will be involved in legal work within England and Wales which will be destined for overseas.

Documents which are handled by a notary are referred to as “notarial acts”. These may be in public or private form - the latter largely confined to witnessing signatures. An act in public form is required where a notary confirms facts which he or she has verified personally. Notaries must verify for each client their identity, legal capacity and understanding of the document as well as their authority if signing on behalf of another party such as a limited company.

This year, around 45 notaries held clients’ money, and a small number of notaries also undertake other reserved legal or regulated activities under the authorisation and regulation of the Master of Faculties.

These include:

- 25 probate services providers
- 15 conveyancing service providers
- 7 tax advice providers
- 11 trust and company service providers

Notaries in scope of the Money Laundering Regulations

The Faculty Office supervises individuals and the information in this report relates to individual notaries as opposed to firms or other entities.

The data presented in this report is a snapshot at the end of the reporting period and is based on answers to the questionnaire all notaries must complete as part of their application for a practising certificate. Notaries renew their practising certificate annually in October, although new admissions and late renewals occur throughout the year.

The analysis at Table 1 indicates that the relevant supervised population has seen a decline, which is, in our view, largely attributable to raised awareness and clarity around the low level of risk to pure notarial services as identified in the guidance produced by Legal Sector Affinity Group (LSAG), which has been approved by Treasury. This downward trend affirms the effectiveness of supervisory activity in driving forward a wider and proportionate understanding of the low risks associated with the work undertaken by notaries.

Table 1 – analysis of relevant population since 2020

Year	2020-2021	2021-2022	2022-2023
Relevant Population	156	130	124
Overall population	728	722	738
% Supervised	21%	%18	%17

Overall, around 124 notaries (which include were considered to provide services that may fall within scope of the money laundering regulations, which is just under 17% of all notaries holding a practising certificate (738) during the relevant period. Importantly, of the 124 notaries holding a practising certificate:

- Almost 90% (111) confirmed that more than half the services they provided were pure notarial
- Around 86% (107) work through small businesses that have less than three employees
- Over 10% (13) are newly qualified notaries practising under supervision (and generally will have a small client base)
- Around 59% (73) have less than 25% of their clients as corporate clients
- Nearly 75% (92) did not act for clients through an intermediary

As far as supervisory populations go, considering the inherent risk amongst other legal service providers, notaries have a relatively *very* low likelihood of being used to conceal criminal property and are a small impact population as a whole. That said, criminals are creative in finding new ways to circumvent defences put in place by service providers and the case study below illustrates how notaries must remain alert to new trends and tactics that may be deployed for money laundering purposes, whether or not they are in scope of the regulations.

Case study 1 – importance of running sanctions checks

A notary was approached to provide notarial services in connection with the assets of a deceased individual. The client was the deceased's son. In accordance with their onboarding policy, the notary duly carried out all the necessary due diligence checks against the client who stood to inherit the deceased's assets. The notary then checked the name of the deceased against the sanctions list and found a match. The notary contacted the Office of Financial Sanctions Implementation and they confirmed that these assets would remain subject to the imposed sanctions and assisting the transfer of these would amount to a sanctions breach.

Supervision

We apply a risk-based approach to supervision and monitoring of notaries. With each notary assigned a risk score based on the information we have gathered. Notaries are required to disclose information on their business and the controls they have in place to mitigate the risk of exposure to money laundering.

The following specific indicators are then considered against each notary in assessing the likelihood and impact of their exposure to money laundering.

- Client risk: (PEPs, complex structures, cash intensive businesses, etc.)
- Complaints and Intelligence (such as disciplinary decision by another regulator, protracted remedial attention, whistleblowing, and accountant's reports)
- Geographical risks (countries or geographic areas in which the notary operates, receives funds from or where clients reside)
- Delivery Channels (through an intermediary)
- Size and Type of practice (number of clients, employees, and controls)

An overview of the risk profiles of notaries that are considered in scope of the regulations is as follows:

Level of Money Laundering Risk	Number of notaries
High Risk	17
Medium Risk	35

Low Risk	72

It should be noted that our risk typology of “High” to “Low” risk is a way of segmenting the risk profiles of the notaries that we supervise, but that “High Risk” in the case of a notary might represent a low risk compared to other sectors. The method used is intended to be fluid and reactive to new information and is continually being developed using a variety of information sources, including for example:

- UK National Risk Assessment
- Financial Action Task Force reports
- National Crime Agency reports
- Inspectors annual report containing a summary of their observations
- Risk assessments carried out by notaries for their own practices
- Accountant’s reports
- Government agencies and other supervisory authorities
- Horizon scanning activities
- Feedback and queries from Notaries

Inspection and monitoring activity is guided by risk so that the intensity and frequency of our monitoring is proportionate to the risk identified. Supervision activities may for example include:

- Visiting a business, including inspection of files, records and conducting interviews.
- Remote reviews by telephone or teleconferencing, which may also include interviewing staff or reviewing documents.
- Questionnaires: requesting information from a member about their anti-money laundering arrangements.
- Require the submission of annual returns relating to the size and nature of a notary’s business.
- Dip sampling to validate whether risk assessments are reasonable.
- Guidance and communications through emails, newsletters, conferences, and the Faculty Office website.

In addition, Notaries who we regulate are required to report breaches to the Faculty Office and are encouraged to do so through our Whistleblowing policy.

Compliance levels and themes

Inspections

A total of 19 inspections were carried out during this period, including a group thematic inspection (i.e., more than one notary). Of these, 8 inspections were conducted remotely with the remainder taking place onsite. Three of the inspections undertaken were by way of a follow-up based on concerns raised during previous inspections.

Our four inspectors (now three) are senior notaries with various areas of expertise and specialist backgrounds. All inspectors have undertaken AML training and are required to maintain their knowledge in this area. They must be independent of the notary that they are inspecting. As part of our future planning for the inspection regime we are currently recruiting for an additional inspector.

Generally, inspectors will consider the following factors when considering money laundering compliance:

1. Has the notary appropriately applied the LSAG guidance and legislation with regards to their own business?
2. Have they taken usual factors into account (geography, cash intensive, high net worth clients and source of funds)?
3. Do decisions around risk appear to be credible and sensible?
4. Generally, does the notary appear to be engaged with the process?
5. Do AML policy and procedures clearly tie in with the risk identified in practice-wide risk assessment?

In their annual report, the inspectors observed that: “Inspectees generally have adopted forms of Firm-Wide and Client and Matter AML Risk Assessments that are suitable for the nature of their respective practices. Most use the templates provided by the Notaries Society, with or without amendments. The firm in which one Inspectee is a partner uses bespoke forms. The same firm (in relation to sanctions compliance) has adopted bespoke forms of consent/confirmation of compliance addressed to its Clients and to be signed by the Clients at an appropriate time. This serves to emphasise to the Client concerned that sanctions compliance is not merely a matter for Notaries and we commend this approach.”

One remote inspection led to a follow-up onsite visit due to a concern raised about poor financial management “whereby a Notary who was practising through a limited company operated to a very large extent on a cash basis, not all of which was going through the company bank account”. By the end of the follow-up inspection, the Notary had purchased a “Sum Up” card reader and provided sufficient assurances that it would be used as the standard method for receiving payment.

Whilst there was no reported AML non-compliance, the majority of the inspection findings

confirmed that notaries do not maintain a written policy in relation with UK Sanctions.

A summary of the inspection and desk-based review activity for this reporting period

<u>Desk Based Reviews</u>	Desk based reviews conducted during the relevant period	38
<u>Compliance ratings</u>	Compliant rating	1
	Generally compliant rating	37
	Not compliant rating	1
<u>Actions taken following desk based reviews</u>	Informal actions following Desk Based Review	38
	Formal actions following Desk Based Review	1
	Referrals to another agency following desk-based review e.g., law enforcement	0
<u>Onsite Visits</u>	Visits conducted	10
<u>Onsite visits results</u>	Compliant rating	1
	Generally compliant rating	9
	Not compliant	
<u>Actions taken following onsite visits</u>	Informal action following visit	9
	Formal action following visit	0
	Referral to another agency following visit e.g., law enforcement	0

Sanctions Questionnaire

Notaries were required to complete a questionnaire about their approach to financial sanctions.

The responses indicated that:

- 82% (609) notaries manually check to see if a party appears on the UK Consolidated Sanctions List.
- 12% (87) indicated that they use specialist software
- 5% (36) used other online tools and systems, or having taken a risk based approach, did not deem it necessary to perform sanctions checks or only perform them when considered necessary.
- 3% (20) indicated that they had declined to act for a prospective client based on sanctions screening

As a follow on from this exercise, the Faculty Office contacted 30 notaries requesting more detailed information around their sanction screening processes and whether they had made disclosures to law enforcement agencies after initial client screening. The key findings of this exercise indicate that not all notaries have a written policy around sanctions screening, or a defined processes on sharing intelligence in response to a potential sanctions breach.

The case study below highlights the importance of being aware of warning signs for money laundering, sanctions breaches and when to submit a Suspicious Activity Report (SAR).

Case study 2 – importance of submitting a SAR

A notary received a general enquiry from a prospective client to notarise a Power of Attorney (PoA). The document mentioned several banks and was destined for use in Russia and was drafted by a US firm through its UAE offices. After completing a sanctions check, the notary declined the instruction because one of the banks referred to in the PoA was on the UK Sanctions list. The notary did not report the matter to Office of Sanctions Implementation (OSFI) on the basis that no actual breach had occurred. Neither was a Suspicious Activity Report made. Notaries were reminded that persons working in the regulated sector are required under Part 7 of the Proceeds of Crime Act 2002 (POCA) and the Terrorism Act 2000 to submit a SAR in respect of information that comes to them in the course of their business if they know or suspect or have reasonable grounds for knowing or suspecting, that a person is engaged in, or attempting, money laundering or terrorist financing. That includes information from cases which do not result in instructions and where none of the parties are clients. All such information could be of value to the law enforcement agencies. In this instance, the notary would need to consider whether there were grounds for suspicion where an international law firm had, the evidence suggested, attempted to use its base in the UAE to circumvent the sanctions regime. In order for the SAR to be of value the notary should carefully and concisely state why they considered the matter to give grounds for knowing or suspecting or having reasonable grounds for knowing or suspecting attempted breach of sanctions.

The Faculty Office will continue its work around what procedures need to be in place in terms of reporting arrangements where a prospective client is declined after a sanctions match has been identified.

Dip sampling websites

Whilst we generally direct our resources to notaries that are deemed to be at higher risk, there is the potential that a notary may inadvertently misreport their services and practice data. This gap is particularly relevant as there is the possibility of a notary straying into a regulated area where they become substantively involved in an underlying regulated transaction. For example, the drafting of Powers of Attorney (transfer of assets) and estate administration (tax advice).

To ensure that that our risk assessments remain relevant, and that notaries are not deliberately or unwittingly misreporting their activities, we carried out an internet-based research and review of 50 notary websites.

Findings	Outcomes
<p>There was no evidence that notaries were offering undisclosed services.</p>	<p>Risk levels have been verified and assurance received that notaries are not, in general, misreporting the services they provide. This helps the Faculty Office to provide an appropriate and targeted approach to the various risk levels.</p>
<p>There was the potential for the line between in scope and out of scope services to be blurred on websites where notarial and solicitor work was combined without satisfactory separation.</p> <p>(37 of the 50 notaries whose websites were viewed were also solicitors)</p>	<p>Notaries need to ensure that there is a clear separation between the work they do as a solicitor and the work they do as a notary. Importantly, joined up policies, systems and risk assessments need to be suitably separated.</p>
<p>Notary-solicitors do not always make appropriate reference to the Faculty Office as their regulator.</p> <p>There is the risk that intelligence may get lost or delayed if misdirected to another regulator.</p> <p>(9 out of the 50 notaries whose websites we sampled did not make adequate reference to the Faculty Office).</p>	<p>Notaries must ensure that all stationery and websites clearly reference redress information on their website as required under Rule 14.2 of the Notaries' Practice Rules 2019.</p>

Training and guidance

To reflect the importance of the AML topic generally, especially during a period of political and economic unrest, continued education in this field is vital. During this period the Master of Faculties, following proper consultation and review, formalised an Order for all notaries to annually complete formal accredited AML training. The Order ensures that all notaries are held to a minimum standard of current AML knowledge.

Quality of the data used

We undertook a thematic review of 50 notaries that disclosed they did not undertake a firm wide risk assessment. Whether or not they provide in-scope services as a notary, due to the lack of intelligence around what would be a material and substantial involvement in an underlying

transaction, a clear internal assessment of the work undertaken which *may* stray into a regulated activity would mitigate the risk of being unwittingly involved in assisting money launderers. Around 90% (45) of these notaries confirmed that they had carried out a risk assessment or provided assurances of their awareness of the Money Laundering Regulations. In the forthcoming year, we will be checking the mandatory CPE returns for a small number of notaries whose responses demonstrated a gap in their awareness and they will be provided with additional guidance where appropriate. We will review this process in future annual reports to consider the effectiveness of this approach in identifying knowledge gaps.

Enforcement

Formal action will be required where there is evidence of significant failings identified that warrant strong enforcement action, such as immediate referral to the Registrar to consider action under the Notaries (Conduct and Discipline) Rules 2015, where, if Notarial Misconduct is proved, the Court of Faculties (the disciplinary tribunal for notaries) may impose the following formal sanctions:

- interim order to suspend the notary from practice indefinitely or on condition
- restrict or limit or impose conditions on the notary's practice pending a hearing
- order that the notary be struck off the Roll of Notaries
- endorse the notary's practicing certificate and impose conditions relating to the monitoring or supervision of his practice
- impose conditions as to the training that the notary must complete or further examination or examinations that he must pass before he may continue or resume practice as a notary, or
- order that the notary be admonished.
- pay a sum not exceeding £10,000 to another party
- although not strictly a sanction, the Registrar may order the advertisement of the disciplinary outcome and note the sanction against the notary's details on the Faculty Office website.

Investigations are carried out and presented by an independent Nominated Notary and examples of serious non-compliance can include:

- No firm-wide risk assessment
- No AML policies, controls and procedures
- No client risk assessments (new and/or ongoing)
- No AML training and this is reflected in the quality of the firm's compliance with the regulations
- No review of adequacy and effectiveness of AML policies, controls and procedures
- No system for recording and submitting Suspicious Activity Reports
- AML records not retained in accordance with the regulations
- AML policies, controls and procedures not being applied once in place
- Client risk assessments inadequate

Currently there are no administrative sanctions available, although referral for Master's Directions under the Notaries (Inspection) Regulations 2014 allow for the requirement to undertake further training or the supervision by a notary appointed by the Master of the notary's practice, or aspects of it, for such period as may be directed by the Master.

Formal enforcement action was taken against two notaries during this period, and both were struck off the Roll of Notaries. These were both notaries who were supervised for anti-money laundering purposes, although the enforcement action did not relate to an actual incidence of money laundering.

Case study 3 – disciplinary sanctions

The Faculty Office received a number of service complaints about A which exposed A's lack of insight on compliance matters. A was suspended during the previous reporting period and subsequently struck off from the Roll of Notaries during this reporting period. This case has AML relevance in that A provided in scope services and one of the allegations proved was that he continued to provide these services whilst being suspended. The Court of Faculties pointed out he was not being regulated by any other professional body during this period and concluded that "This makes the allegations drawn to our attention by the Nominated Notary more serious and, taken with the other breaches to the Rules which we have set out, we impose the same penalty in respect of this breach."

Reporting breaches

Notaries must demonstrate that they are submitting good quality Suspicious Activity Reports. A total of 27 notaries reported having submitted a SAR during this period, which is an increase from the previous year where only 15 notaries confirmed that they had submitted a SAR which exceeds the 21% increase on the previous year reported by UKFIU for all SARs submitted. We view this as a positive indicator, although this needs to be tested against the quality and value of the SARs submitted.

The Faculty Office has a published policy for disclosures whistleblowing.

Emerging Risks and looking ahead

Register of Overseas Entities (ROE)

The ROE, which is a new requirement for foreign companies that own UK property to disclose their beneficial owners and control structure was brought into being under the Economic Crime (Transparency and Enforcement) Act 2022 (the Act). By increasing transparency of the identity of anonymous foreign ownership of UK property, the ROE aims to prevent of money Laundering. The impact of this on the notarial profession needs to be analysed and we will review the verification work undertaken by notaries acting as authorised ROE agents.

Remote technologies and identification

The use of new technologies, including remote notarisation is on the rise. Some of the challenges and vulnerabilities associated with this includes:

- The reliability and security of the technology used, such as video conferencing and electronic signatures
- The authenticity and validity of the documents and information provided by the client, such as passports, utility bills, company registers, etc.
- The possibility of impersonation, fraud, or coercion by the client or a third party.

- The compliance with data protection and privacy laws in different jurisdictions.
- The availability and accessibility of independent sources of verification

Notaries have been directed to the valuable guidance produced by the National Document Fraud Unit at the Home Office which is around document identification and verification to increase awareness of the different types of identity documents used for identification purposes, including indicators to help recognise forged documents. We will continue to monitor this area of risk and collaborate with other regulators to feed into a wider pool of intelligence. We have also been conducting internal work to consider the risks presented by AI to the notarial profession and intend to hold our annual lecture on this topic in early 2024.

We have appointed a consultant to review our AML procedures and have injected additional resources to support our supervisory role. For the coming year, we will focus on:

- Increasing the intensity of our supervisory work, including a spotlight on the quality of SARs
- Continue our work in relation to UK Sanctions
- Reflect on the overlap between AML and the new Regulatory Objective into the Legal Services Act 2007

The consultant has provided high quality training tailored to staff which was tailored to the notarial sector and built on the consultant's work at the Law Society of Scotland (which regulates notaries in Scotland).

Useful Links

[Financial crime – the Faculty Office](#)

[The Money Laundering, Terrorist Financing and Transfer of Funds \(Information on the Payer\) Regulations 2017 \(revised\)](#)

[Money Laundering and Terrorist Financing \(Amendment\) Regulations 2019](#)

[Money Laundering and Terrorist Financing \(Amendment\) \(EU Exit\) Regulations 2020](#)

[The Money Laundering and Terrorist Financing \(Amendment\) \(No. 2\) Regulations 2022](#)

[OPBAS Sourcebook](#)

[National assessment of money laundering and terrorist financing](#)

[HM Treasury](#)

[Home Office](#)

[Foreign, Commonwealth & Development Office](#)

[UK Counter Terrorism Policing](#)

[National Crime Agency](#)

[Notaries Code of Practice - Money Laundering](#)

[Legal Sector Affinity Group \(LSAG\) anti-money laundering guidance for the UK legal sector](#)

[New guidance POCA prosecutions \(2021\)](#)

[Inspectors Report](#)

[Assurance \(Risk and Supervision\) Policy \(The Faculty Office\)](#)

[Financial Action Task Force Guidance for a Risk-Based Approach Guidance for Legal Professionals](#)

[Economic Crime \(Transparency and Enforcement\) Act 2022](#)

[HMT's National Risk Assessment of Proliferation Financing](#)

[Home Office Guidance – Document Identification & Verification](#)

[Website Spot Check – Rule 14.2 of the Notaries Practice Rules 2019](#)

[Criminal Record Checks – Guidance](#)

[Suspicious Activity Reporting \(SAR\)](#)

[The Legal Sector Affinity Group \(LSAG\) updates](#)

[High Risk Countries](#)